

IN THE
UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

NANCY LOFTUS,)
Plaintiff,)
v.) Case No. 1:15-cv-692 (CMH/JFA)
DAVID BOBZIEN, *et al.*,)
Defendants.)

**DEFENDANTS' MOTION TO DISMISS THE COMPLAINT
FOR FAILURE TO STATE A CLAIM**

Defendants David P. Bobzien and Edward L. Long Jr., by counsel, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, hereby move the Court to dismiss the Complaint filed by Plaintiff Nancy Loftus for failure to state a claim upon which relief may be granted.

The grounds for this Motion are more fully set forth in the accompanying Memorandum in Support.

Respectfully submitted,

DAVID P. BOBZIEN
EDWARD L. LONG JR.

By: _____ /s/
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CERTIFICATE OF SERVICE

I certify that on June 24, 2015, I will electronically file a copy of the attached with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

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